California Environmental Protection Agency
Department of Toxic Substances Control

STANDARDIZED HAZARDOUS WASTE FACILITY PERMIT
Series B

Facility Name:
P. Kay Metal, Inc.
2448 East 25th Street
Los Angeles, California 90058

Owner Name:
P. Kay Metal, Inc.
2448 East 25th Street
Los Angeles, California 90058

Operator Name:
P. Kay Metal, Inc.
2448 East 25th Street
Los Angeles, California 90058

Facility EPA ID Number:
CAL000024110

Effective Date: Draft

Expiration Date: Draft

Pursuant to California Health and Safety Code sections 25200 and 25201.6, this Standardized Hazardous Waste Facility Permit is hereby issued to: P. Kay Metal, Inc.

The Issuance of this Permit is subject to the terms and conditions set forth in Attachment A. This Permit consists of 22 pages, including this cover page and Attachment A.

_____

Peter Bailey, P.G.
Team Leader, Permit Renewal Team
Department of Toxic Substances Control

Date:

P. KAY METAL INC.
2448 EAST 25TH STREET
LOS ANGELES, CALIFORNIA 90058

STANDARDIZED HAZARDOUS WASTE FACILITY PERMIT
SERIES B

ATTACHMENT "A"

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PART I. DEFINITIONS

All terms used in this Permit shall have the same meaning as those terms have in the California Health and Safety Code, division 20, chapter 6.5 and California Code of Regulations, title 22, division 4.5, unless expressly provided otherwise by this Permit.

1. **"DTSC"** as used in this Permit means the California Department of Toxic Substances Control.

2. **"Facility"** as used in this Permit means all contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage resource recovery, disposal or recycling of hazardous waste. A hazardous waste facility may consist of one or more treatment, transfer, storage, resource recovery, disposal or recycling operational units or combinations of these units.

   For the purpose of implementing corrective action under California Code of Regulations, title 22, division 4.5, a hazardous waste facility includes all contiguous property under the control of the owner or operator required to implement corrective action.

3. **"Permittee"** as used in this Permit means the Owner and Operator.

4. **"RCRA"** as used in this Permit means the Resource Conservation and Recovery Act (42 U.S.C. §6901 et seq.).

5. **"RCRA hazardous waste"** as used in this Permit is as defined in Health and Safety Code section 25120.2.

6. **"Non-RCRA hazardous waste"** as used in this Permit is as defined in Health and Safety Code section 25117.9.

PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP

1. Owner of Facility

P. Kay Metal, Inc.
2448 East 25th Street
Los Angeles, California 90058

2. Owner of Real Property

P. Kay Metal, Inc.
2448 East 25th Street
Los Angeles, California 90058

3. Operator of Facility

P. Kay Metal, Inc.
2448 East 25th Street
Los Angeles, California 90058

4. Location

P. K. Metal, Inc.'s facility (Facility) is located at 2448 East 25th Street, Los Angeles, California 90058 in Los Angeles County at latitude 34° 0' 54" North and longitude 118° 13' 41" West. The Facility is on the corner of 25th Street and Minerva Street and bounded by Santa Fe Avenue to the west, 25th Street to the north, Minerva Street to the east and 26th street to the south. The property includes lots 22, 24, 26, 28, and 30, in parcel No. 011-012 off H.M. Ames subdivision of the glassell tract, partly within the City of Los Angeles and partly within the City of Vernon, as per map recorded in book 5168, page 026 of miscellaneous records of the Office of the County Recorder of the Los Angeles County. The Facility is located above the 100-year flood plain in an area zoned "M" for General Industrial. See Attachment A-1, Facility Location Map.

5. Description of Facility Operations

The Facility operates as a hazardous waste storage and treatment facility in the city of Los Angeles to reclaim lead and tin metal from off-site generated solder dross and recycle these metals into new solder and alloys used in the electronics and radiator industry. The Facility measures approximately 31,080 square feet and consists of (1) a main building (which houses the administrative office, a laboratory, manufacturing area, three container storage areas and the treatment unit, (2) an employee parking area, (3) two truck parking and loading/unloading areas, and (4) a fourth container storage area.

The Facility's treatment process is conducted inside the main building. The

treatment process uses two furnaces (melting pots) to melt the solder dross to separate and reclaim the metal. The recovered metal is poured into molds to produce bars, ingots, and sows. Bars and ingots are sold to customers and the sows are stored at the facility to produce bars and ingots to customer specifications. Bars are also extruded at the facility in the manufacturing area to produce thin wire and sold to customers. Each furnace has a hood that connects to the baghouse, which is an Air Pollution Control Device. Dust from the treatment process is collected in the baghouse in containers as a satellite accumulation area. The baghouse is permitted by the South Coast Air Quality Management District (SCAQMD). A detailed Process Flow Diagram for the treatment process is included in this permit as Attachment A-3 and A-4.

The solder dross is a RCRA hazardous waste because of its lead content. However, solder dross that is received from off-site sources for recycling purpose is exempt from RCRA permitting regulations, but is subject to the California permitting requirements pursuant to Health and Safety Code 25201.6.

Three container storage units identified as HWS-A, HWS-B, and HWS-C are used to store both the treatment generated hazardous wastes and incoming solder dross to help facilitate the treatment process. A fourth container storage unit identified as HWS-1A is located outdoors and is use to store treatment generated hazardous waste in a roll-off bin to transport the hazardous waste to an offsite permitted hazardous waste Treatment Storage Disposal Facility (TSDF). The locations of the container storage units are shown in the facility plot plan provided in this permit as Attachment A-2.

6. Facility History

The Facility has accepted, stored, and treated hazardous waste solder (tin/lead) dross at this location since 1978. It has operated as a solder manufacturing facility for over 70 years. A grant of Standardized Permit Interim Status was issued by DTSC on October 1, 1993 to allow the Facility to continue its hazardous waste operations. A Series B Standardized Permit was first issued by DTSC to the Facility on January 20, 1998. The Facility obtained a permit modification on November 18, 2002 to rebuild the Facility after a fire that destroyed the Facility on August 8, 2001.

7. Facility Size and Type for Fee Purposes

This Permit is categorized as a “Series B” Standardized Permit pursuant to Health and Safety Code section 25201.6 and for purposes of Health and Safety Code sections 25205.2 and 25205.19.

PART III. GENERAL CONDITIONS

1. PERMIT APPLICATION DOCUMENTS

The Standardized Permit Application dated January 30, 2009 and submitted to DTSC by the Permittee is hereinafter referred to as the "Standardized Permit Application" and is hereby made a part of this Permit by reference.

2. EFFECT OF PERMIT

(a) The Permittee shall comply with the terms and conditions of this Permit and the provisions of the Health and Safety Code and California Code of Regulations (Cal. Code Regs.), title 22, division 4.5. The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes or regulations or local ordinances, except the obligation to obtain this Permit. The Permittee shall obtain the permits required by other governmental agencies, including but not limited to, those required by the applicable land use planning, zoning, hazardous waste, air quality, water quality, and solid waste management laws for the construction and/or operation of the Facility.

(b) The Permittee is permitted to treat and store hazardous wastes in accordance with the terms and conditions of this Permit. Any management of hazardous wastes not specifically authorized in this Permit is strictly prohibited.

(c) Compliance with the terms and conditions of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.

(d) DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee.

(e) Failure to comply with any term or condition set forth in the Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including but not limited to penalties pursuant to Health and Safety Code section 25187.

(f) Failure to submit any information required in connection with the Permit, or falsification and/or misrepresentation of any submitted information, is grounds for revocation of this Permit (Cal. Code Regs., tit. 22, §66270.43).

(g) In case of conflicts between the Operation Plan and the Permit, the Permit conditions take precedence.

(h) This Permit includes and incorporates by reference any conditions of waste discharge requirements issued to the Facility by the State Water Resources Control Board or any of the California Regional Water Quality Control Boards and any conditions imposed pursuant to section 13227 of the Water Code.

3. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

A Notice of Exemption has been prepared in accordance with the requirements of Public Resources Code section 21000 et seq. and the CEQA Guidelines, section 15070 et seq. of California Code of Regulations, title 14.

4. ACCESS

(a) DTSC, its contractors, employees, agents, and/or any United State Environmental Protection Agency representatives are authorized to enter and freely move about the Facility for the purposes of interviewing Facility personnel and contractors; inspecting records, operating logs, and contracts relating to the Facility; reviewing progress of the Permittee in carrying out the terms of Part VI of the Permit; conducting such testing, sampling, or monitoring as DTSC deems necessary; using a camera, sound recording, or other documentary-type equipment; verifying the reports and data submitted to DTSC by the Permittee; or confirming any other aspect of compliance with this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5. The Permittee shall provide DTSC and its representatives access at all reasonable times to the Facility and any other property to which access is required for implementation of any provision of this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5, and shall allow such persons to inspect and copy all records, files, photographs, documents, including all sampling and monitoring data, that pertain to work undertaken pursuant to the entire Permit or undertake any other activity necessary to determine compliance with applicable requirements.

(b) Nothing in this Permit shall limit or otherwise affect DTSC's right to access and entry pursuant to any applicable State or federal laws and regulations.

5. CLOSURE COST ESTIMATE

The closure cost estimate approved in 2009 is $139,393 (in 2009 dollars).

PART IV. PERMITTED UNITS AND ACTIVITIES

This Permit authorizes operation only of the facility units and activities listed below. The Permittee shall not treat, store or otherwise manage hazardous waste in any unit other than those specified in this Part IV. Any modifications to a unit or activity authorized by this Permit require the written approval of DTSC in accordance with the permit modification procedures set forth in California Code of Regulations, title 22, division 4.5.

UNIT 1 - NAME:

Melting Furnace A
Melting Furnace E

LOCATION:

Both melting furnaces are located on the south end of the Facility inside the main building. The location of the two melting furnaces is shown in the Facility Plot Plan in Attachment A-2.

ACTIVITY TYPE:

Miscellaneous Treatment

ACTIVITY DESCRIPTION:

The Facility's treatment process is carried out inside the main building. The treatment unit consists of two authorized melting furnaces (A and E) where the solder dross is melted and refined to separate and reclaim the metal (tin and lead). The solder dross received in containers from offsite generators is moved from one of the authorized container storage units (HWS-A, HWS-B, and HWS-C) to the treatment unit and the solder dross is transferred into one of the melting furnaces to melt the solder dross. Prior to pouring solder dross into the melting furnace, the Permittee prepares the furnace with a bath of metal that is heated to a temperature between 600° to 800° F. The furnaces are heated by natural gas. During melting of the dross, in order to facilitate the separation of the metal from the oxide to increase metal recovery from the dross, the Facility adds sulfur, carbon, caustic and metal saponifiers to the batch and mixing it thoroughly with a mechanical mixer until the oxide rises to the surface of the furnace. Once the melting furnace has reached its temperature set point and mixed for at least 10 minutes, the recycling process is complete. The non-metal portion of the dross is predominantly oxides of tin and lead that are removed with perforated ladles and placed into containers which are then placed into one of the authorized container storage units. The metal oxide material is resold to recyclers. The molten metal in the melting furnace is now a non-waste, oxide free metal and alloyed. The molten metal is then pumped from the melting furnace into molds and allowed to cool producing bars, ingots, or sows. Once cooled, the metal is removed from the molds, stamped with a lot number, weighed and placed into finish product inventory. The bars may be extruded

into thin wires.

Each melting furnace has a hood with access drapes and ducts, which connect the hood to the baghouse. The drapes on the hoods are kept closed during the melting and refining process. The fumes and particulates from the furnaces are drawn by vacuum to the baghouse hopper or containers. The Permittee empties the baghouse hopper periodically by emptying the waste into containers which are then placed in one of the authorized container storage units or by pouring the waste into the roll-off bin.

PHYSICAL DESCRIPTION:

Furnace A consists of a large steel or iron melting furnace with a concave shaped bottom above a natural gas burner. The melting furnace is surrounded with fire bricks that are mortared together and encased on the outside by steel sheeting welded in place. The heat is channeled around the furnace so that the outside surface of the furnace is heated evenly.

Furnace E is a lead sweating furnace consists of a double pot. Furnace E utilizes natural gas burner located within the heating chamber to melt the material.

Table 1 shows the specifications of furnaces A and E.

Each furnace is enclosed by a specifically designed hood. The hoods are attached to drapes and ducts that collect any particulates and/or aerosols that may be emitted during the melting process. The hoods, ducting, and baghouse are part of the air pollution control system which is permitted by Southern California Air Quality Management District.

Table 1 Melting Furnace Specifications

Furnace Number	**Pot Capacity**		**Natural Gas BTU/Hr.**	**Dimensions Inner Dia., Depth**
	Pounds	**Cubic Ft.**		
Furnace A	59,000	84	1,500,000	I.D. 72”, Depth 48”
Furnace E	Pot 1: 600 Pot 2: 600	5	10,000	60.5”LX34.5”WX31”H Pots: I.D 19”, Depth 20”

MAXIMUM CAPACITY:

The capacities listed in the Physical Description section above are the design capacity for each melting furnace. Treatment in the melting furnaces is conducted in batches. Each batch takes about 8 to 10 hours to process. The maximum treatment capacity of the melting furnaces is based on the pot capacity in pounds per batch. Melting Furnace A has a pot capacity of 59,000 lbs/batch. Melting furnace E has a pot capacity of 1,200 lbs/batch. Table 2 shows the pot capacity and batch processing time for each melting furnace.

Table 2 Melting Furnace Process Time

Furnace Number	Capacity, Lbs Non-Refined	Process Time, Hrs. Non-Refined
Furnace A	59,000 lbs	8-10 hrs
Furnace E	1,200 lbs	8-10 hrs

WASTE TYPES:

Solder dross.

HAZARDOUS WASTE CODES:

RCRA Hazardous Waste: D008 (received from off-site sources for recycling purpose and therefore exempt from RCRA permitting requirements)

California Hazardous Waste: 181

UNIT-SPECIFIC SPECIAL CONDITIONS:

1. The Permittee shall not treat wastes that contain free liquids in the melting furnaces.

2. The Permittee shall not place any hazardous wastes on the floor. The Permittee must use a DOT-compliant containers to assist in metal separation during treatment.

3. The Permittee shall operate the ventilation and air pollution control system to control the hazardous waste emissions whenever a melting furnace is in operation.

4. The Permittee shall ensure that proper respiratory protective equipment be used at or near the treatment unit whenever a melting furnace is in operation. The Permittee shall comply with the applicable requirements of California Code of Regulations, title 8 regarding the use of the respiratory protective equipment and the permissible exposure limit for lead for its personnel at the Facility.

AIR EMISSION STANDARDS

This Unit is not subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5, article 28, or article 27.

UNIT 2:

Storage Unit HWS-A
Storage Unit HWS-B
Storage Unit HWS-C

LOCATION:

HWS-A is located in the southeast side of the Facility near the truck loading area. HWS-B is located in the southeast side corner of the Facility, just south of HWS-A. HWS-C is located on the western wall of the Facility. The Storage Units HWS A, B, and C are identified in the Facility Plot Plan, Attachment A-2.

ACTIVITY TYPE:

Storage in Containers

ACTIVITY DESCRIPTION:

Containers are used to store hazardous waste which is later treated in the melting furnaces. The Facility has three container storage units within the main building for the storage of offsite-generated solder dross and waste generated onsite from the treatment of the solder dross. These onsite-generated wastes are flux skimmings, oxide skimmings, contaminated trash and debris, and air pollution control system waste. All wastes listed above are stored in 55-gallon, 30-gallon or five-gallon containers.

The containers from offsite generators are stored in the permitted container storage units until they are ready to be processed in the treatment unit. The containers containing the solder dross from offsite generators are moved by a forklift from one of the container storage units to the treatment unit for processing. Wastes generated in the treatment unit and in the baghouse are collected in 55-gallon containers and stored in any of the container storage units in the main building.

PHYSICAL DESCRIPTION:

Hazardous waste storage units HWS-A, HWS-B, and HWS-C are located inside the main building with a concrete base. Secondary containment is not required since all hazardous wastes stored in these units are solids. HWS-A measures 26 feet by 24 feet, HWS-B measures 8 feet by 8 feet, and HWS-C measures 28 feet by 33 feet

MAXIMUM CAPACITY:

The maximum storage capacities for each unit are as follows:

HWS-A: 10,560 gallons (or 192 55-gallon containers) or 384,000 lbs.

HWS-B: 880 gallons (or 16 55-gallon containers) or 32,000 lbs.

HWS-C: 9,240 gallons (or 168 55-gallon containers) or 336,000 lbs.

The combined maximum total capacity in HWS-A, HWS-B, and HWS-C is 12,840 gallons (or 233 55-gallon containers).

WASTE TYPES:

Solder dross from offsite sources, flux skimmings, skimming oxides, contaminated trash from general cleanup, and air pollution control device waste.

HAZARDOUS WASTE CODES:

RCRA Hazardous Waste: D008 (received from off-site sources for recycling purpose and therefore exempt from RCRA permitting requirements)

California Hazardous Waste: 181

UNIT-SPECIFIC SPECIAL CONDITIONS:

1. The combined total capacity in HWS-A, HWS-B, and HWS-C shall not exceed 12,840 gallons (or 233 55-gallon containers) or 466,000 pounds at any one time.

2. The Permittee shall comply with the following container stacking requirements::

   (a) A container with the capacity of more than 55 gallons shall not be stacked on top of another container.
   (b) 55-gallon containers shall not be stacked more than two containers high.
   (c) 30-gallon containers shall not be stacked more than three containers high.
   (d) 5-gallon containers shall not be stacked more than five containers high.
   (e) When stacking, the height of the containers should not exceed six feet high.

3. The Permittee shall maintain a minimum of 24 inches of aisle space between rows of containers holding or designated to hold hazardous waste in the container storage units.

AIR EMISSION STANDARDS

This Unit is not subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5, article 28, or article 27.

UNIT 3:

HWS-1A

LOCATION:

The container storage unit HWS-1A is located on the southeast corner of the Facility outside the main building and east of container storage unit HWS-B. HWS-1A is shown in the Facility Plot Plan in attachment A-2.

ACTIVITY TYPE:

Storage in a roll-off bin

ACTIVITY DESCRIPTION:

A roll-off bin staged in this area is used to collect and store only solid hazardous waste generated from the treatment process. These wastes include flux skimmings, contaminated trash, and air pollution control system waste. Containers containing waste from the melting furnace operations and from the baghouse are consolidated into the bin. Containers holding hazardous waste from the melting furnaces or the baghouse are moved directly to the container storage area HWS-1A and their contents are removed manually with the aid of a forklift and shovel or they are stored in the container storage areas HWS-A, HWS-C, and HWS-C prior to being emptied into the roll-off bin in the container storage unit HWS-1A. The waste in the roll-off bin is then transported for treatment or disposal to an authorized TSDF.

PHYSICAL DESCRIPTION:

The area of HWS-1A is outside on a concrete base and measures 10 feet by 17 feet. The roll-off bin measures approximately 14 feet long, 8 feet wide and 5.5 feet high. The bin has lids that are opened when waste is added and mechanically sealed before transporting. The secondary containment is not needed for this unit since only solid wastes are stored in this unit.

MAXIMUM CAPACITY:

The maximum capacity is 32.6 cubic yards (or 6,582 gallons) in one roll-off bin.

WASTE TYPES:

Flux skimmings, contaminated trash from cleanup, air pollution control device waste.

HAZARDOUS WASTE CODES:

RCRA Hazardous Waste: D008 (received from off-site sources for recycling purpose and therefore exempt from RCRA permitting requirements)

California Hazardous Waste: 181, 591

UNIT-SPECIFIC SPECIAL CONDITIONS:

1. The Permittee shall not store more than 32.6 cubic yards or 6,582 gallons of hazardous waste in this storage unit at any one time
2. The only container that the Permittee is allowed to use to store hazardous waste in this unit is the roll-off bin.
3. The Permittee shall not store any liquid hazardous waste in this unit.
4. The roll-off bin used by the Permittee to store hazardous waste must be certified by the California Highway Patrol for transportation of hazardous waste.

AIR EMISSION STANDARDS

This Unit is not subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5, article 28, or article 27.

PART V. SPECIAL CONDITIONS

1. The Permittee shall not manage any RCRA hazardous waste, except for D008 solder dross that is received from off-site sources for recycling purpose. Except for D008 solder dross that is received from off-site sources for recycling purpose, the Permittee shall not store any RCRA hazardous waste more than 90 days in any of the container storage units HWS-A, HWS-B, HWS-C and HWS-1A.

2. The Permittee is prohibited from any storage or treatment activity not specifically described in Part IV of this permit or as otherwise authorized by DTSC.

3. The Permittee shall not treat a total influent volume of hazardous waste greater than 100,000 pounds per calendar month.

4. The Permittee may store non-RCRA hazardous waste that is restricted from land disposal beyond one year; however, the Permittee bears the burden of proving that such storage is solely for the purpose of accumulating such quantities of hazardous waste necessary to facilitate proper recovery, treatment or disposal pursuant to California Code of Regulations, title 22, section 66268.50.

5. Containers holding hazardous wastes shall be stored only in the authorized areas designated in Part IV of this Permit. Any non-hazardous waste that is stored in a unit authorized by this Permit for management of hazardous waste shall be subject to the conditions of this Permit, including volume calculations, compatibility and inspections.

6. The total maximum hazardous waste storage capacity at the Facility is 19,422 gallons (or 784,600 lbs) for all storage areas.

7. The Permittee shall follow the procedures specified in the Facility's Standardized Permit Application for the treatment of hazardous waste.

8. The Permittee shall comply with the applicable requirements of California Code of Regulations, title 8 regarding the use of the respiratory protective equipment and the permissible exposure limit for lead for its personnel at the Facility. The permissible exposure limit for lead for the Permittee's personnel at the Facility shall be limited to an eight-hour time weighted average concentration of less than 50 micrograms per cubic meter.

9. The Permittee shall measure, sample and analyze the exhaust emissions of the stack that serves as the air pollution control system (baghouse) including the melting furnaces to verify that the system is operating properly and efficiently. The parameters to be measured, sampled and analyzed shall include the stack gas volume flow rate, stack gas temperature, water content, and lead content. The analysis shall be performed once every two years. The Permittee shall perform analysis using United States Environmental Protection Agency (U.S.

EPA) or the SCAQMD methods (i.e. SCAQMD Rules 1407, 1420, etc.). The Permittee shall submit analytical results to DTSC and the SCAQMD within 30 days of completing the test analysis.

10. The Facility shall not be a designated Treatment, Storage, or Disposal Facility on the manifests for any exempt transfer activities conducted pursuant to California Code of Regulations, title 22, section 66263.18.

11. For the purpose of calculating the permitted maximum capacity limitations for storage and for secondary containment, all containers in the authorized units are assumed to be full, and all hazardous waste that is stored or located in an authorized unit shall be included in the calculation for that unit, including any hazardous waste that is covered by the transfer facility exemption pursuant to California Code of Regulations, title 22, section 66263.18.

12. The Permittee shall conduct sampling activities only within an authorized unit or within a secondary containment system or device of a loading and unloading area designated in the permit.

PART VI - CORRECTIVE ACTION

1. In the event the Permittee identifies an immediate or potential threat to human health and/or the environment, discovers new releases of hazardous waste and/or hazardous constituents, or discovers new Solid Waste Management Units (SWMUs) not previously identified, the Permittee shall notify DTSC orally within 24 hours of discovery and notify DTSC in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.

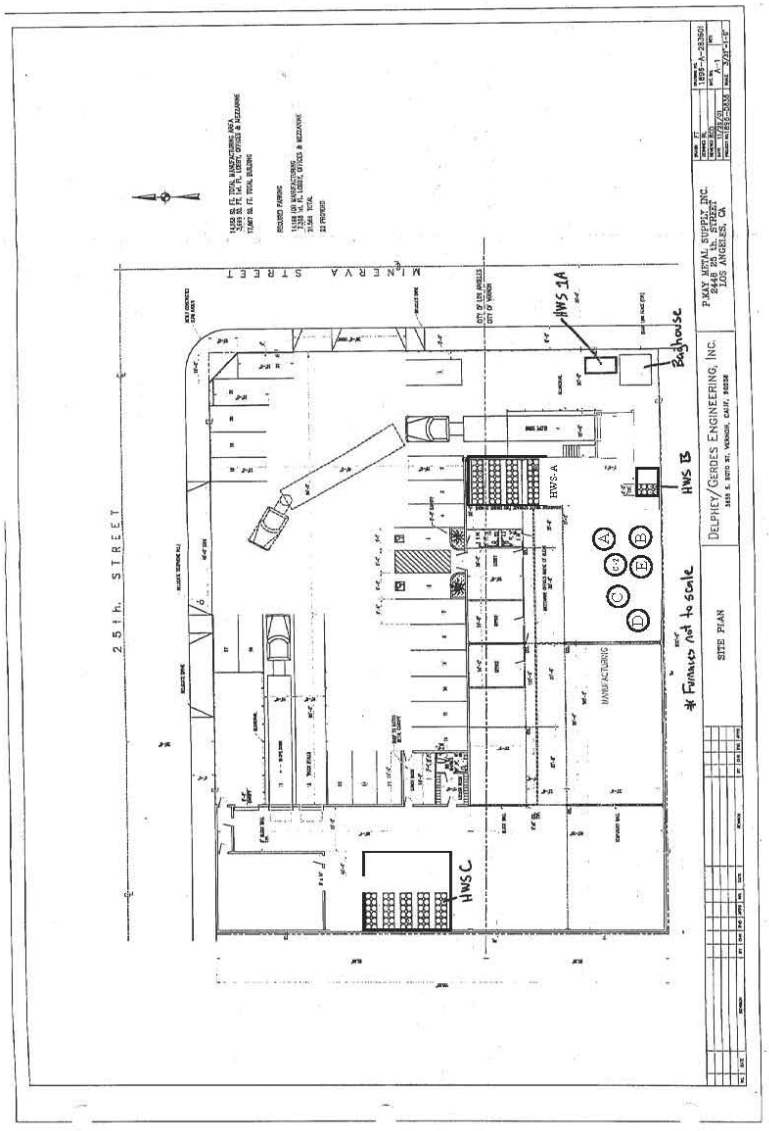
2. DTSC may require the Permittee to investigate, mitigate and/or take other applicable action to address any immediate or potential threats to human health and/or the environment and newly identified SWMUs or releases of hazardous waste and/or hazardous constituents. If and when corrective action is required at the Facility, the Permittee shall conduct corrective action under either a Corrective Action Consent Agreement or an Enforcement Order for Corrective Action issued by DTSC pursuant to Health and Safety Code sections 25187 and 25200.10.

3. To the extent that work being performed pursuant to Part VI of the Permit must be done on property not owned or controlled by the Permittee, the Permittee shall use its best efforts to obtain access agreements necessary to complete work required by this Part of the Permit from the present owner(s) of such property within 30 days of approval of any workplan for which access is required. “Best efforts” as used in this paragraph shall include, at a minimum, a certified letter from the Permittee to the present owner(s) of such property requesting access agreement(s) to allow the Permittee and DTSC and its authorized representatives access to such property and the payment of reasonable sums of money in consideration of granting access. The Permittee shall provide DTSC with a copy of any access agreement(s). In the event that agreements for the access are not obtained within 30 days of approval of any workplan for which access is required, or of the date that the need for access becomes known to the Permittee, the Permittee shall notify DTSC in writing within 14 days thereafter regarding both efforts undertaken to obtain access and its failure to obtain such agreements. In the event DTSC obtains access, the Permittee shall undertake approved work on such property. If there is any conflict between this permit condition on access and the access requirements in any agreement entered into between DTSC and the Permittee, this permit condition on access shall govern.

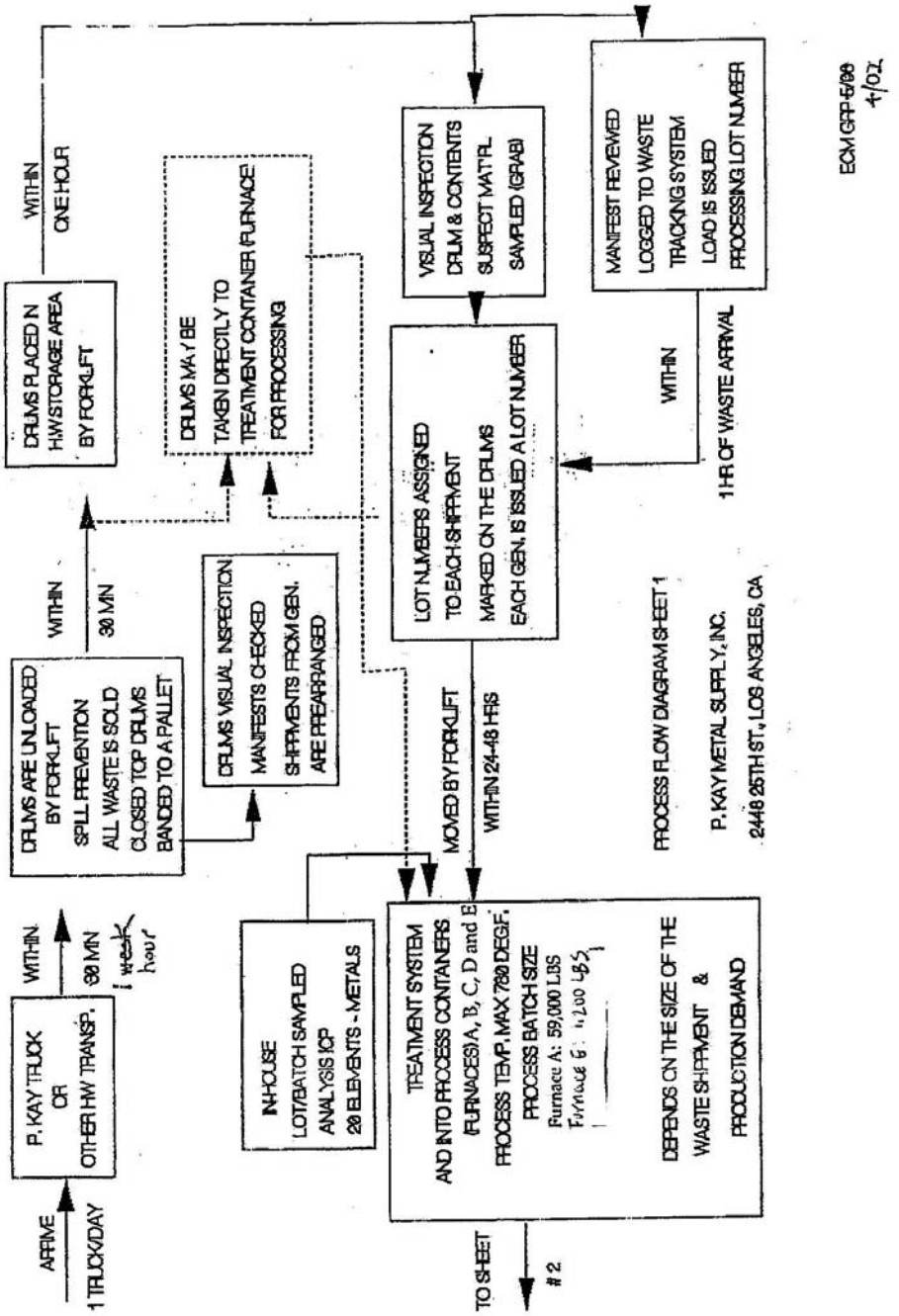
4. Nothing in Part VI of the Permit shall be construed to limit or otherwise affect the Permittee’s liability and obligation to perform corrective action including corrective action beyond the facility boundary, notwithstanding the lack of access. DTSC may determine that additional on-site measures must be taken to address releases beyond the Facility boundary if access to off-site areas cannot be obtained.

Attachment A-1
Facility Location Map

Attachment A-2
Facility Plot Plan



Attachment A-3
Facility Treatment Process Flow Diagram



Attachment A-4
Facility Treatment Process Flow Diagram